

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

GARY LEBOWITZ, Individually and on Behalf of
All Others Similarly Situated,

Plaintiff,

Civil Action No.
06-CV-2198 (MGC)

v.

DOW JONES AND COMPANY, INC.

Defendant

ANDREW NEWMARK, ALLAN NEWMARK,
and BURT FAURE, Individually and on Behalf of
All Others Similarly Situated,

Plaintiffs,

Civil Action No.
06-CV-2992 (MGC)

v.

DOW JONES AND COMPANY, INC.

Defendant

DECLARATION OF OREN GISCAN

I, Oren Giskan, declare and state as follows:

1. I am a member of Giskan, Solotaroff Anderson & Stewart, LLP, counsel to Plaintiffs in the above-captioned action. I submit this declaration in support of the letter brief submitted April 12, 2011 regarding CAFA jurisdiction. I am fully familiar with the facts set forth below.

2. Attached hereto as Exhibit 1 is a true and correct copy of Plaintiffs' Letter to Court dated December 13, 2007.

3. Attached hereto as Exhibit 2 is a true and correct copy of Plaintiffs' First Supplemental Memorandum of Law in Further Support of Motion for Class Certification, filed on December 13, 2007.

4. Attached hereto as Exhibit 3 is a true and correct copy of Plaintiffs' Letter to Court dated December 21, 2007.

5. Attached hereto as Exhibit 4 is a true and correct copy of Plaintiffs' Letter to Court dated March 3, 2008.

6. Attached hereto as Exhibit 5 is a true and correct copy of Plaintiffs' Letter to Court dated May 27, 2008.

7. Attached hereto as Exhibit 6 is a true and correct copy of Plaintiffs' Letter to Court dated June 24, 2008.

8. Attached hereto as Exhibit 7 is a true and correct copy of Plaintiffs' Letter to Court dated July 21, 2008.

9. Attached hereto as Exhibit 8 is a true and correct copy of Plaintiffs' Letter to Court dated September 10, 2008.

10. Attached hereto as Exhibit 9 is a true and correct copy of Plaintiffs' Letter to Court dated December 8, 2008.

11. Attached hereto as Exhibit 10 is a true and correct copy of Plaintiffs' Letter to Court dated January 30, 2009.

12. Attached hereto as Exhibit 11 is a true and correct copy of Plaintiffs' Letter to Court dated April 3, 2009.

13. Attached hereto as Exhibit 12 is a true and correct copy of Plaintiffs' Letter to Court dated December 8, 2009.

14. Attached hereto as Exhibit 13 is a true and correct copy of Plaintiffs' Letter to Court dated April 5, 2010.

15. Attached hereto as Exhibit 14 is a true and correct copy of Plaintiffs' Proposed Findings of Fact and Conclusions of Law.

16. Attached hereto as Exhibit 15 is a true and correct copy of the Declaration of Oren Giskan dated May 4, 2010 and its exhibits.

17. Attached hereto as Exhibit 16 is a true and correct copy of the Joint Stipulation dated May 11, 2010.

18. Attached hereto as Exhibit 17 is a true and correct copy of the transcript of the hearing that took place before Hon. Miriam Goldman Cedarbaum on May 12, 2010.

19. Attached hereto as exhibit 18 is a true and correct copy of Plaintiffs' Letter to Court dated May 21, 2010.

20. Attached hereto as exhibit 19 is a true and correct copy of Plaintiffs' Letter to Court dated July 12, 2010.

21. Attached hereto as exhibit 20 is a true and correct copy of Plaintiffs' Letter to Court dated July 27, 2010.

22. Attached hereto as exhibit 21 is a true and correct copy of Plaintiffs' Letter to Court dated July 30, 2010.

23. Attached hereto as exhibit 22 is a true and correct copy of Plaintiffs' Letter to Court dated December 2, 2010.

24. Attached hereto as exhibit 23 is a true and correct copy of Plaintiffs' Letter to Court dated February 24, 2011.

25. Attached hereto as exhibit 24 is a true and correct copy of Plaintiffs' Letter to Court dated April 4, 2011.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 12th day of April 2011 in New York, New York.



Oren Giskan